

### **REMARKS**

The Office Action dated July 19, 2006 has been received and carefully noted. The above amendments to the claims and the following remarks are submitted as a full and complete response thereto.

Claims 22, 34 and 39-45, are amended to more particularly point out and distinctly claim the subject matter of the present invention, and new claim 46 is added. No new matter is added. Claims 27-37 and 39-46 are respectfully submitted for consideration.

The Office Action objected to claim 22 because of informalities. Applicant respectfully submits that claim 22 has been amended to correct the typographical informality. Accordingly, withdrawal of the objection to claim 22 is respectfully requested.

The Office Action rejected claims 22-37 and 39-45 under 35 U.S.C. 112, first paragraph for failing to comply with the enablement requirement. Applicant submits that claims 22, 39 and 44 have been amended to replace the phrase "the network side" with the phrase "at least one of a first radio access network and a second radio access network," as described in the present specification at least on page 8 lines 5-9. Accordingly, withdrawal of the rejection of claims 22-37 and 39-45 under 35 U.S.C. 112, first paragraph is respectfully requested.

The Office Action rejected claims 39-43 under 35 U.S.C. 112, second paragraph as being indefinite. As discussed above, claim 39 has been amended to more particularly point out and distinctly claim the subject matter of the present invention. Accordingly,

withdrawal of the rejection of claims 39-43 under 35 U.S.C. 112, second paragraph is respectfully requested.

The Office Action rejected claims 22-30, 32, 33-37, 39, 40, 41 and 42 under 35 U.S.C. 103(a) as being obvious over US Patent No. 5,826,188 to Tayloe et al. (Tayloe), in view of US Patent No. 5,408,419 to Wong (Wong). The Office Action took the position that Tayloe disclosed all of the features of these claims except for the feature of a specific service being requested. The Office Action asserted that Wong disclosed this feature. Applicants respectfully submit that the cited references, taken individually or in combination, fail to disclose or suggest all of the features recited in any of the pending claims.

Claim 22, from which claims 23-37 depend, is directed to a method of interworking between different radio access networks. A request for specific service is detected, wherein the request for specific service is received from at least one of a first access network and a second access network. Information is accessed on conditions for the first radio access network and the second radio access network, network for giving sufficient support for a specific service requested by said request for specific service. Whether or not said first radio access network and said second radio access network meet said conditions is analyzed. A handover is initiated of said radio transceiver device from said first radio access network to said second radio access network if the conditions are met by the second radio access network but the first radio access network does not. A

radio transceiver device that is capable of operating with a first radio access network and a second radio access network is attached to said first radio access network.

Claim 39, from which claims 40-45 depend, is directed to a network interworking device. A detecting unit is configured to detect a request for specific service, wherein said request for specific service is received from at least one of a first radio access network and a second radio access network. An analyzing unit responsive to said detecting unit, is configured to access information on conditions for said first and said second radio access networks for giving sufficient support for the a specific service requested by said request for specific service and to analyze whether or not said first radio access network and said second radio access network meet the conditions. An initiating unit responsive to said analyzing unit, is configured to initiate a handover of said radio transceiver device from said first radio access network to said second radio access network if the respective conditions are not met by said first radio access network but by said second radio access network. The network interworking device is configured to operate with a telecommunication network, and the telecommunication network includes at least two radio access networks. A radio transceiver device capable of operating with said first radio access network and said second radio access network is attached to said first radio access network.

Claim 44 is directed to a computer program embodied on a computer readable medium. The computer program detects a request for specific service, wherein the request for specific service is received from at least one of a first radio access network

and a second radio access network. Information is accessed on conditions for the first and the second radio access network for giving sufficient support for a specific service requested by said request for specific service. Whether or not said first radio access network and said second radio access network meets said conditions is analyzed. A handover is initiated of said radio transceiver device from said first radio access network to said second radio access network if the second radio access network meets the conditions but the first radio access network does not. A radio transceiver device, capable of operating with a first radio access network and a second radio access network, is attached to said first radio access network, and the first radio access network and the second radio access network being of different kinds.

Applicants respectfully submit that each of the pending claims recite features that are neither disclosed nor suggested in any of the cited references.

Tayloe is directed to a method for handing off calls between differing radio telecommunication networks. The method described in Tayloe, enables a subscriber unit to hand-off a call between two communication networks having different air interfaces and/or using differing "locational standards". For example, a network can receive location interworking information from another network for use in a network-to-network handoff. See Tayloe, column 3 lines 1-5.

Wong is directed to a cellular radio telephone system signaling protocol for a cellular network which comprises a plurality of exchanges. Each of these exchanges includes a software packet for providing services to subscribers.

Applicant respectfully submits that the cited references fail to disclose or suggest at least the features of detecting a request for a specific service and initiating a handover of said radio transceiver device from said first radio access network to said second radio access network if the conditions are met by the second radio access network but the first radio access network does not, as recited in claim 22 and similarly recited in claims 39 and 44.

The Office Action relied on Wong to disclose this feature and cites column 8, lines 9 to 32 of Wong. However, Wong merely describes what happens when one of the exchanges makes a request for a specific service that is not provided by another exchange. Specifically, in this passage of Wong, a communication between the two exchanges is described, but no indication of a handover of the mobile terminal of the subscriber is described. Thus, Wong does not cure the admitted deficiencies of Tayloe and the combination of Tayloe and Wong, fails to disclose or suggest all of the features of any of the above claims.

Further, Applicant respectfully submits that one skilled in the art would not be motivated to modify Tayloe with the teachings of Wong as alleged in the Office Action. Tayloe is directed to a handing off call as discussed above. Wong is directed to a signaling protocol for communicating between a plurality of exchanges and does not suggest any use during a handover. Thus, one skilled in the art would not be motivated to modify Tayloe with the teachings of Wong as alleged in the Office Action.

Applicant respectfully submits that because claims 23-30, 32, 33-37, 40, 41 and 42 depend from claims 22 and 39, these claims are allowable at least for the same reasons as claims 22 and 39 as well as for the additional features recited in any of these dependent claims.

Based at least on the above, Applicant respectfully submits that the cited references fail to disclose or suggest all of the features recited in any of claims 22-30, 32, 33-37, 39, 40, 41, 42 and 44. Accordingly, withdrawal of the rejection of claims 22-30, 32, 33-37, 39, 40, 41, 42 and 44 under 35 U.S.C. 103(a) is respectfully requested.

The Office Action rejected claim 31 under 35 U.S.C. 103(a) as being obvious over Tayloe and Wong, in further view of US Patent No. 6,33,047 to Popovic (Popovic). The Office Action took the position that Tayloe and Wong disclosed all of the features of claim 31 except wherein either the second or the first radio access network is a UMTS network. The Office Action relied on Popovic to disclose this feature. Applicant respectfully submits that the cited references, taken individually or in combination, fail to disclose or suggest all of the features recited in claim 31. Specifically, Tayloe and Wong are deficient at least for the reasons discussed above regarding claim 22 and Popovic fails to cure these deficiencies.

Popovic is directed to optimal code sequences that are generated for use in spreading and de-spreading functions in a code division multiple access (CDMA) communications system. A family of quadriphase spreading codes is employed that provides a maximal number of spreading codes to achieve a high capacity in the CDMA

communications system while at the same time having a minimal peak cross-correlation between any two spreading codes within that family to ensure cross-correlation interference is kept at or below acceptable levels. The Office Action relied on Popovic to disclose a UMTS system. Thus, Popovic does not cure the deficiencies of Tayloe and Wong, and the cited combination of references fail to disclose or suggest all of the features recited in claim 31.

Accordingly, withdrawal of the rejection of claim 31 under 35 U.S.C. 103(a) is respectfully requested.

The Office Action rejected claims 43 and 45 under 35 U.S.C. 103(a) as being obvious over Tayloe and Wong, in further view of US Patent No. 6,256,497 to Chambers (Chambers). The Office Action took the position that Tayloe and Wong disclosed all of the features of these claims except the feature of analyzing whether a subscriber using the radio transceiver is entitled to use a requested service. The Office Action asserted that Chambers disclosed this feature. Applicant respectfully submits that the cited references taken individually or in combination, fail to disclose or suggest all of the features recited in claims 43 and 45.

Tayloe and Wong are discussed above. Chambers is directed to a dual mode mobile telephone which is adapted to work between a satellite network and a land-based network (PLMN). In the system described in Chambers, the user of the mobile telephone can choose between services provided by the satellite network and services provided by the PLMN (see column 2 lines 32 – 38 and lines 42-53). Further, a check is performed

whether a particular subscriber is permitted to use a second service provided by the second network. See column 3 lines 4 – 40 and column 9 lines 45-67. The Office Action relied on Chambers to teach a means to analyze whether a subscriber using the radio transceiver is entitled to use the requested service. Thus, Chambers fails to cure the deficiencies of Tayloe and Wong and therefore, the cited combination of references fail to disclose or suggest all of the features recited in claims 43 and 45.

Accordingly, withdrawal of the rejection of claims 43 and 45 under 35 U.S.C. 103(a) is respectfully requested.

As discussed above, new claim 46 is added. Applicant respectfully submits that claim 46 recites features that are neither disclosed nor suggested in any of the cited references.


Applicant respectfully submits that each of claims 22-37 and 39-46 recite features that are neither disclosed nor suggested in any of the cited references. Accordingly, it is respectfully requested that each of claims 22-37 and 39-46 be allowed, and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.



In the event this paper is not being timely filed, the applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

  
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Enclosures: Additional Claim Fee Transmittal  
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